

**IN THE DISTRICT COURT OF THE UNITED STATES FOR THE  
MIDDLE DISTRICT OF ALABAMA, NORTHERN DIVISION**

<b>VIVIAN HANDY,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CIVIL ACTION NO.</b>
	)	<b>2:07cv 376 -MHT</b>
<b>STATE OF ALABAMA, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**JOINT MOTION FOR EXTENSION**

COME NOW the parties and respectfully request the Court extend the deadline for the filing of the Report of the Parties Planning Meeting. As grounds therefore, the parties state and show as follows:

1. The Court has recently granted several motions to intervene and converted the intervention complaints into separate lawsuits, including the instant one.
2. Many of these separate lawsuits have a deadline for the Report of June 1, 2007. However, the deadline for the instant case is May 25, 2007.
3. Counsel have scheduled a meeting for Thursday, May 31, 2007 at 10:00 a.m. to discuss the proposed discovery schedules for all the "spin off" cases.
4. Counsel believe that this meeting and discussion of the discovery needed for all these cases will aid the parties and the Court in streamlining them and moving them forward.
5. No prejudice will attach to any party with the requested extension.
6. Otherwise stated, the parties expect to be better able to provide insight to the Court as to the best way to handle this case and the others during the discovery

phase of this litigation with the seven day extension of time.

WHEREFORE, premises considered, the parties respectfully request the court extend the deadline for which they have to file the Rule 26 report of the parties planning meeting seven (7) days to June 1, 2007.

Respectfully Submitted,

/s/Russell W. Adams

Russell W. Adams

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CERTIFICATE OF SERVICE

I hereby certify that I have on May 24, 2007, electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following (or by U.S. Mail as indicated below to the non-CM/ECF participants):

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